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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

IN RE: FACEBOOK, INC. CONSUMER PRI-  
VACY USER PROFILE LITIGATION,

This document relates to:

ALL ACTIONS

CASE NO. 3:18-MD-02843-VC

**DECLARATION OF DEBORAH STEIN IN  
SUPPORT OF FACEBOOK, INC.'S  
RENEWED ADMINISTRATIVE MOTION  
TO SEAL**

I, Deborah Stein, hereby declare as follows:

1. I am a partner at the law firm of Gibson, Dunn & Crutcher LLP, counsel of record for Facebook, Inc. (“Facebook”) in the above-captioned matter. I am a member in good standing of the State Bars of California and New York. I submit this supplemental declaration in support of Facebook’s Renewed Administrative Motion to Seal. I make this supplemental declaration on my own knowledge, and I would testify to the matters stated herein under oath if called upon to do so.

2. Attached as **Exhibits 33-A, 34-A, 51-A, 63-A, 65–68-A, 74-A, 90–93-A, 95-A, 96-A, 106-A, 112-A, 121-A, and 139-A** are a true and correct **unredacted** copy of Plaintiffs’ Exhibits 33, 34, 51, 63, 65–68, 74, 90–95, 96, 106, 112, 121, and 139.

3. Attached as **Exhibits 33-B, 34-B, 51-B, 63-B, 65–68-B, 74-B, 90–93-B, 95-B, 96-B, 106-B, 112-B, 121-B, and 139-B** are a true and correct **redacted** copy of Plaintiffs’ Exhibits 33, 34, 51, 63, 65–68, 74, 90–95, 96, 106, 112, 121, and 139.

4. Attached as **Exhibits 7-A, 9-A, 20-A, 25-A, 41-A, 56-A, 64-A, and 73-A** are a true and correct **unredacted** copy of Defendants’ Exhibits 7, 9, 20, 25, 41, 56, 64, and 73.

5. Attached as **Exhibits 7-B, 9-B, 20-B, 25-B, 41-B, 56-B, 64-B, and 73-B** are a true and correct **redacted** copy of Defendants’ Exhibits 7, 9, 20, 25, 41, 56, 64, and 73.

6. Attached as **Exhibits 1-A** and **1-B** are a true and correct **unredacted** and **redacted** copies, respectively, of the Deposition Transcript of Michael Duffey.

7. Attached as **Exhibits 2-A** and **2-B** are a true and correct **unredacted** and **redacted** copies, respectively, of the Deposition Transcript of Jackie Chang.

8. Attached as **Exhibits 3-A** and **3-B** are a true and correct **unredacted** and **redacted** copies, respectively, of the Special Master’s Amended Order Regarding Production of Named Plaintiff Data and the Exhibits thereto.

9. Attached as **Exhibits 4-A** and **4-B** are a true and correct **unredacted** and **redacted** copies, respectively, of Richardson Declaration ISO Facebook, Inc., Gibson, Dunn & Crutcher LLP, and Orin Snyder's Supplemental Brief in Opposition to Plaintiffs' Motion for Sanctions.

10. Facebook proposes redacting confidential information regarding its data systems and Facebook's proprietary data storage and processing practices.<sup>1</sup> How Facebook stores, manages, tracks, preserves, deletes, and processes data for billions of users across its data systems are key components of its business that set it apart and ahead of its competitors. I understand that, if publicly disclosed, Facebook's competitors could take advantage of this information to improve their own methods for managing high volumes of user data or for tracking and storing user data across data systems, to Facebook's competitive disadvantage. Hackers and other bad actors also could use this information to better

<sup>1</sup> See Plaintiffs' Ex. 33 at 68, 69, 72, 123–127, 142, 144, 166, 167, 172–175, 179–181, 193–206, 227–410, 513–526, 531–616, 619, 62, 665, 666, 697, 698, 701, 703, 704, 706, 707, 711, 714–716, 718, 722, 723, 752, 756, 757, 762, 763, 765, 766, 770, 773–777, 788–792, 794, 800–803; Plaintiffs' Ex. 34 at 9–10, 12–13; Plaintiffs' Ex. 51 at 29–30, 33, 84–88; Plaintiffs' Ex. 63 at 3–5, 7; Plaintiffs' Ex. 66 at 1–2, 5–6, 8–11; Plaintiffs' Ex. 67 at 11–12, 14, 16–17, 19–20, 22–23, 26–27, 29; Plaintiffs' Ex. 68 at 1–2, 4, 9–11, 15–16; Defendants' Ex. 7 at 69:5–6, 108:1–12, 113:13–23, 114:24–115:1, 129:9–25, 130:2–3; Defendants' Ex. 9 at 3, 5; . Defendants' Ex. 20 at 4, 8, 14–15, 17–18, 22, 25–29; Defendants' Ex. 25 at 3, 7–8, 16–17, 19–22, 26–33, 37, 41–42; Limited portions that reveal confidential information regarding Facebook's proprietary data systems and data storage and processing practices. Defendants' Ex. 41 at 31–37, 39; Limited portions that reveal confidential information regarding Facebook's proprietary data systems and data storage and processing practices. Plaintiffs' Reply Ex. 74 at 3, 8, 17–24, 29–44; Limited portions that reveal confidential information regarding Facebook's proprietary data systems and data storage and processing practices. Ex. 3 at 114–117, 128–120, 137–138, 150–152, 156–158, 160, 162, 167, 170, 172–173, 178, 183–185, 191, 202, 211, 217, 220, 222, 227, 237, 284, 286, 327–328, 358–359, 398, 400–401, 413, 424, 428, 435, 446, 458, 460–461, 463, 465, 476–477, 488–489, 492, 549, 570, 572, 582–583, 588–589, 602–604, 606, 627–628, 633–634, 637, 655, 670, 672–673, 676, 679, 758–759, 772–774, 789, 792–797, 831; Plaintiffs' Supplemental Ex. 90 at 16–17, 33–34, 36; Plaintiffs' Supplemental Ex. 91 at 17–18; Plaintiffs' Supplemental Ex. 92 at 1–2, 8–9; Plaintiffs' Supplemental Ex. 95 at 42:5–6, 11–15; Plaintiffs' Supplemental Ex. 96 at 2–3; Plaintiffs' Supplemental Ex. 106 (Chang Tr.) at 163:9–10, 11, 13, 15; 182:5, 19–20; 223:8, 224:21–22; 225:5; pdf pages 29–30; Plaintiffs' Supplemental Ex. 112 at 2; Ex. 1 at 42:5–6, 11–15; 54:3–5; 57:16–17, 22–23; 58:12; 64:24–25; 65:16–18; 23–25; 66:1–4; 79:12; 83:14–16; 96:21–22, 25; 97:2; 158:5–6; Ex. 2 at 74:19, 24; 75:19–20; 76:21; 77:4, 7–8; 24–25; 78:11–23; 79:7–9; 80:21–22; 81:4, 81:25–82:3; 82:9–14, 18, 20–22; 82:24–83:3; 83:9–11; 84:6–7, 10, 20; 85:3–5, 7, 11; 110:2–4, 6–7; 114:4, 12; 116:22–24; 127:22; 128:2, 6, 11–12, 19; 154:2, 24; 155:2; 156:17; 162:22, 25; 163:9–10, 11, 13, 15; 182:5, 19–20; 184:4–5, 9–10; 203:6, 8, 11–14, 20–25; 204:1–2, 19–22, 24–25; 205:4–5, 7–8, 10–11, 13–14, 20–25; 206: 1–4, 9–16; 222:2–3, 22–23; 223:8, 224:21–22; 225:5; 227:12–16; 24–25; 228:1, 14–20, 24; 229: 2–6, 10, 12; 231:5; 231:21–22; 232:1–4; 233:9–10, 14–23, 25; 234:1–4; 237:6, 9; 252:11–13; 283:12–14, 16, 18; 284:1; 285:3–5, 9–11, 22; Ex. 4 at 5; Defendant's Supplemental Ex. 56 at 185:4–7, 9–10, 12–14, 16, 18; Defendant's Supplemental Ex. 64 at 5; Defendants' Supplemental Ex. 73 at 2–3, 5.

1 understand Facebook's data systems and target specific repositories of data, potentially harming both  
 2 Facebook and its users. This Court previously ordered that Facebook has shown good cause to seal  
 3 certain highly technical information related to its data systems. Dkt. 1082.

4  
 5 11. Facebook proposes redacting confidential and competitively sensitive information re-  
 6 garding its business programs, strategies, and decisions, including confidential technical details of how  
 7 Facebook develops and uses data to target advertisements to the most relevant users.<sup>2</sup> This information  
 8 also includes confidential strategic discussions regarding Facebook's existing and potential future busi-  
 9 ness models and strategies. I am informed and believe that public disclosure of confidential infor-  
 10 mation regarding Facebook's business models could allow Facebook's competitors to use this infor-  
 11 mation developed at Facebook's expense to improve or develop their own competing techniques, to  
 12 Facebook's competitive disadvantage. Additionally, I am informed and believe that public disclosure  
 13 of confidential information regarding Facebook's business strategies could allow Facebook's compet-  
 14 itors to copy these strategies, developed at Facebook's expense, to more effectively compete with Fa-  
 15 cebook. Finally, Facebook's ability to serve advertisements to its users effectively is an essential aspect  
 16 of its business and I am informed and believe that, if publicly disclosed, this information could allow  
 17 Facebook's competitors to improve their serve of advertisements to Facebook's competitive disad-  
 18 vantage.  
 19

20  
 21 12. Facebook proposes to seal confidential information regarding Facebook's privacy and  
 22 platform policy enforcement practices, including Facebook's decision-making process for evaluating  
 23  
 24

25  
 26 <sup>2</sup> Defendants' Ex. 7 at 61:10–21, 65:12–14, 65:17–66:5, 66:19–23, 66:25–67:11, 69:11–13, 69:16–20,  
 27 69:22–25, 70:1–12, 70:20–25, 79:17–78:2, 80:20–81:19, 82:17–19, 83:24–84:1, 85:7–10, 85:13,  
 28 85:16–19, 86:9–10, 86:13–22, 88:24–89:2, 89:4–6, 89:8–13, 90:2–3, 90:5–11, 90:20–21, 90:23, 91:1–  
 4, 91:8–10, 91:14, 91:24, 92:2–4, 92:14–16, 92:22–23, 97:3–5, 106:20–107:11, 107:15–16, 107:19–  
 21, 107:22–24, 116:17–25, 130:21–24, 131:21–23, 132:1–4, 132:6–8, 132:19–21, 132:24–25; Plain-  
 tiffs' Reply Ex. 74 at 7; Ex. 3 at 758, 772; Defendants' Supplemental Ex. 64 at 4.

1 apps and developers that may be violating its policies.<sup>3</sup> This includes confidential information regard-  
 2 ing ADI documents and references thereto. I understand that public disclosure of details regarding  
 3 Facebook's policy-enforcement efforts would reveal confidential information regarding Facebook's  
 4 internal operations that could be used by bad actors to attempt to circumvent and evade Facebook's  
 5 enforcement strategies, potentially harming Facebook and its users.  
 6

7 13. Facebook also asks the Court to permanently seal certain confidential information re-  
 8 garding Facebook employees, including the names of certain employees and their email addresses.<sup>4</sup> If  
 9 these names were disclosed publicly, competitors would have access to confidential information re-  
 10 garding Facebook's employees.  
 11

12 I declare under penalty of perjury under the laws of the United States of America that the fore-  
 13 going is true and correct.  
 14

15 Executed on December 12, 2022 in Los Angeles, California.  
 16

17  
 18  
 19 /s/ Deborah Stein  
 20 Deborah Stein  
 21  
 22  
 23  
 24

25 <sup>3</sup> Defendants' Ex. 7 at 129:9–25, 130:2–3, 133:9–10, 133:12, 133:16–17, 133:20–22, 133:24, 134:3–5,  
 26 134:8–10, 134:12–13; Plaintiffs' Supplemental Ex. 90 at 17, 33–34, 36; Plaintiffs' Supplemental Ex.  
 91 at 1–2; Plaintiffs' Supplemental Ex. 92 at 1–2, 5–6, 8; Plaintiffs' Supplemental Ex. 93 at 1, 3.

27 <sup>4</sup> Plaintiffs' Ex. 67 at 169–170, 175, 178, 184, 188; Defendants' Ex. 41 at 8–9; Ex. 3 at 549–550;  
 28 Plaintiffs' Supplemental Ex. 112 at 2–8; Plaintiffs' Supplemental Ex. 121 at 5; Plaintiffs' Supplemental  
 Ex. 139 at 1; Ex. 2 at 207:16, 22; 208:5;